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Co-counsel for Petitioners

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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CIMC RAFFLES OFFSHORE (SINGAPORE))	
LIMITED AND YANTAI CIMC RAFFLES)	
OFFSHORE LIMITED,)	
)	
Petitioners,)	13 Civ. 0052 (JSR)
)	ECF Case
v.)	
)	
SCHAHIN HOLDING S.A., SCHAHIN)	
ENGENHARIA S.A., SEA BISCUIT)	
INTERNATIONAL INC., BLACK GOLD)	
DRILLING LLC, BAERFIELD DRILLING)	
LLC AND SORATU DRILLING LLC,)	
)	
Respondents.)	
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**NOTICE OF MOTION FOR UNOPPOSED PETITION TO CONFIRM A FOREIGN
ARBITRATION AWARD AND FOR AN ENTRY OF JUDGMENT AGAINST SCHAHIN
HOLDING S.A., SCHAHIN ENGENHARIA S.A. AND SEA BISCUIT INTERNATIONAL
INC.**

PLEASE TAKE NOTICE THAT Petitioners CIMC Raffles Offshore (Singapore) and Yantai CIMC Raffles Limited (collectively, "CIMC Raffles"), by their undersigned attorneys, hereby

move, as Respondents Schahin Holding S.A. (“Schahin Holding”), Schahin Engenharia S.A. (“Schahin Engenharia”) and Sea Biscuit International Inc. (“Sea Biscuit”) have not opposed the Petition to Confirm a Foreign Arbitration Award and For an Entry of Judgment (“Petition”), for an order against these Respondents:

- a. Confirming the Award issued by the Arbitral Tribunal;
- b. Entering judgment on the Award in the amount of US\$69,470,777.41 in favor of Petitioners and against Schahin Holding, Schahin Engenharia, and Sea Biscuit, jointly and severally;
- c. Entering judgment on the Award for post-award, pre-judgment interest of US \$1,678,718.51 for the amount described in paragraph b;
- d. Entering judgment on the Award in the amount of US\$13,206.28 in favor of Petitioners and against Schahin Holding, Schahin Engenharia, and Sea Biscuit, jointly and severally;
- e. Granting Petitioners post-judgment interest on all amounts owed running from entry of judgment until payment in full, pursuant to 28 U.S.C. § 1961;
- f. Granting Petitioners their costs of this application of US\$350.00;
- g. Granting Petitioners their attorney’s fees and costs of US\$69,582.68; and
- h. Granting such other and further relief as the Court may deem just and proper.

Pursuant to a telephonic conference held on April 8, 2013, CIMC Raffles shall serve and file its motion papers on Schahin Holding, Schahin Engenharia, and Sea Biscuit on April 9, 2013, using the alternative service procedures outlined in the Court’s Order for Alternative Service on Foreign Respondents, March 14, 2013. Schahin Holding, Schahin Engenharia, and Sea Biscuit are ordered by the Court to respond on or before April 16, 2013 at 11:00am. The Honorable Jed S. Rakoff, United States District Judge, will hear oral argument on this issue on April 16, 2013 at

11:00am in Courtroom 14-B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York. If Schahin Holding, Schahin Engenharia, and Sea Biscuit fail to appear, the Court will grant and enter the Petition as a final judgment at 11:30am.

Respectfully submitted,

Dated: New York, New York
April 9, 2013

DEBEVOISE & PLIMPTON LLP

By: /s/ David W. Rivkin
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Whereas, CIMC Raffles has sufficiently supported the Petition and demonstrated that there is no question of material fact.

Whereas, without justification, Schahin Holding, Schahin Engenharia, and Sea Biscuit refused to abide by the arbitral tribunal's Award.

THEREFORE the Clerk of the Court is directed, with respect to Respondents Schahin Holding, Schahin Engenharia, and Sea Biscuit only, to:

- a. Confirming the Award issued by the Arbitral Tribunal;
- b. Entering judgment on the Award in the amount of US\$69,470,777.41 in favor of Petitioners and against Schahin Holding, Schahin Engenharia, and Sea Biscuit, jointly and severally;
- c. Entering judgment on the Award for post-award, pre-judgment interest of US \$1,678,718.51 for the amount described in paragraph b;
- d. Entering judgment on the Award in the amount of US\$13,206.28 in favor of Petitioners and against Schahin Holding, Schahin Engenharia, and Sea Biscuit, jointly and severally;
- e. Granting Petitioners post-judgment interest on all amounts owed running from entry of judgment until payment in full, pursuant to 28 U.S.C. § 1961;
- f. Granting Petitioners their costs of this application of US\$350.00;
- g. Granting Petitioners their attorney's fees and costs of US\$69,582.68; and

SO ORDERED:

Dated: New York, NY
April _ 2013

JED S. RAKOFF, U.S.D.J.